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November 21, 1991

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NOV 21 1991

**Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554**

**Federal Communications Commission
Office of the Secretary**

**Re: MM Docket No.
RM-**

Dear Ms. Searcy:

Transmitted herewith on behalf of Seventh Day Christian Group, are an original and five (5) copies of its Petition for Rulemaking, which requests the allocation of Channel 239A at Jourdanton, Texas.

Should further information be desired in connection with this matter, please communicate with the undersigned.

Very truly yours,



**Lee J. Peltzman
Counsel for
SEVENTH DAY CHRISTIAN GROUP**

**LJP:bpt
Enclosure
15050.06\Searcy.N11**

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NOV 21 1991

Before the
Federal Communications Commission
Washington, D.C. 20554

Federal Communications Commission
Office of the Secretary

In the Matter of)	
)	
Amendment of Section)	MM Docket No.
73.202(b))	RM-
FM Broadcast Stations)	
(Jourdanton, Texas))	

To: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

PETITION FOR RULEMAKING

Seventh Day Christian Group ("Seventh Day"), through counsel, hereby files its Petition for Rulemaking which seeks the amendment of the Commission's RM Table of Allotments, in order to allocate Channel 239A to the community of Jourdanton, Texas. In support whereof, the following is submitted:

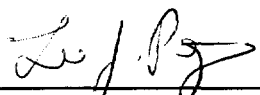
1. The allocation of Channel 239A at Jourdanton, Texas can be made in accordance with the Commission's minimum distance separation and principal community coverage requirements without the need for any site restriction. See Engineering Report of William F. Suffa, P.E. Jourdanton is a licensable community of sufficient size and development to warrant its own radio station. According to the 1990 census report, the population of Jourdanton is 3,220 persons. Yet, Jourdanton currently lacks any aural transmission service. Clearly, the public interest would be served by the allotment of a first local service to the community of Jourdanton.

2. Accordingly, for the reasons stated above, Seventh Day requests that the Commission adopt this petition to allocate Channel 239A at Jourdanton, Texas. In the event Channel 239A is allotted to Jourdanton, Seventh Day will promptly file an application for a construction permit and, if its application is granted, will immediately construct its station and commence broadcast operations.

Respectfully submitted,

SEVENTH DAY CHRISTIAN GROUP

By:



Lee J. Peltzman
Its Attorney

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November 21, 1991

15050.06\Pleading.RM

ENGINEERING STATEMENT

Proposed New FM Allotment

prepared for
Seventh Day Christian Group
Jourdanton, Texas

This statement has been prepared by Seventh Day Christian Group (Seventh Day), petitioner for an new FM allotment on Channel 239A to serve Jourdanton, Texas. The proposed allotment will represent a first local service to Jourdanton.

Seventh Day proposes to allot channel 239A at Jourdanton. This channel may be allotted in conformance with all FCC criteria with a reference point located at:

North Latitude 28° 55' 04",

West Longitude 98° 32' 56".

These coordinates correspond to the community reference point established in the National Atlas. 3.16 mV/m coverage could be provided to Jourdanton from these coordinates.

Jourdanton is the county seat of Atacosa County, Texas. It presently has no other aural broadcast services licensed to the community. The 1990 U.S. Census shows a population of 3,220 persons residing in the City of Jourdanton.

Table 1 is an allocation study for the proposed allotment demonstrating that the reference point satisfies all FCC allocation requirements.

Conclusion

Channel 239A may be allotted to Jourdanton in conformance with all pertinent FCC requirements.

November 12, 1991



William P. Suffa, P.E.
D.C. Registration 9013
Virginia Registration 18300

Table 1

Allocation Study

**Seventh Day Christian Group
Jourdanton, Texas**

Channel 239A

Reference Site: 28-55- 4 North
98-32-56 West

Chan	Call	Status	City	State	Power	Height	Latitude	Distance	Regrd
Applicant/Licensee							Longitude	Bearing	Clearance
								(km)	(km)
236C2	NEW	CP	Comfort	TX			29-54- 8	115.9	55.0
	Nancy K. Hinson	Grubbs			50.0 kW	150M	98-57- 9	340.3	60.9
237A	KVWGFM	LIC	Pearsall	TX			28-53-13	54.9	31.0
	Pearsall Broadcasters, Inc.				3.00 kW	62M	99- 6-40	266.6	23.9
238B	XHRGFM		Ciudad Acuna	CI			29-19- 1	234.8	170.0
					3.70 kW	48M	100-55- 5	281.4	64.8
238C	KZFM	LIC	Corpus Christi	TX			27-39-32	169.4	165.0
	Texas Media Group, Inc.				100.0 kW	303M	97-34-10	145.2	4.4
238C	KKMJFM	LIC	Austin	TX			30-19-23	171.8	165.0
	The Tremont Group, Ltd.				100.0 kW	305M	97-47-58	24.8	6.8
239A			Nuevo Laredo	TA			27-29-45	183.2	175.0
					0.00 kW	0M	99-30- 0	210.9	8.2
240A		ADD	Goliad	TX			28-40-23	112.8	72.0
	Alco Communications				0.00 kW	0M	97-25-40	103.7	40.8
240C			Villa Union	CI			28-14- 0	227.6	215.0
					0.00 kW	0M	100-44-30	251.1	12.6
241C1	KSAQ	CPM	San Antonio	TX			29-38- 0	79.7	75.0
	Inner City Broadcasting Corporation of S				100.0 kW	182M	98-37-50	354.3	4.7

Note: Separation requirements to Mexican stations are for Class B facilities.